

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In re* Flint Water Cases  
5:16-cv-10444/17-cv-10164

Hon. Judith E. Levy  
United States District Judge

\_\_\_\_\_/

This Motion Relates to:

*Bellwether III Cases*

\_\_\_\_\_/

**STIPULATION REGARDING DEADLINES  
FOR BELLWETHER III PRE-TRIAL MOTIONS**

Bellwether III Plaintiffs and Defendants Veolia Water North America Operating Services, LLC, Veolia North America, Inc., and Veolia North America, LLC (the “VNA Defendants”) stipulate and agree to the following amendments to the existing deadlines most recently set forth in ECF No. 3079 and the Court’s text-only order dated August 13, 2024, regarding the dates for summoned jurors to appear in Ann Arbor to answer questionnaires.<sup>1</sup>

<u>Event</u>	<u>Amended Deadline/Deadline Range (where applicable)</u>
Motions in Limine—Opening Briefs	July 22, 2024

\_\_\_\_\_  
<sup>1</sup> The change to the deadlines set forth in ECF No. 3079 is indicated in red font.

<u>Event</u>	<u>Amended Deadline/Deadline Range (where applicable)</u>
Daubert Hearing on remaining Daubert Motion	August 7, 2024  In-person hearing at 10:00 AM
Motions in Limine— Response Briefs  (With the exception of Plaintiffs’ response to three of Veolia’s twelve motions) <sup>2</sup>	August 13, 2024
Motions in Limine—Reply Briefs  (With the exception of three motions)	August 23, 2024
Remaining Motions in Limine— Response Briefs (the three mentioned above)	August 19, 2024
Motions in Limine—Reply Briefs (the three mentioned above)	August 29, 2024

---

<sup>2</sup> Specifically, ECF 3044, 3048, 3056.

<u>Event</u>	<u>Amended Deadline/Deadline Range (where applicable)</u>
Summoned Jurors to Courthouse to Answer Questionnaires (Court Staff Only) (Jury Department takes approximately one week to process questionnaires and make them available to counsel and the Court)	September 18, 2024 9:00am, cont'd if needed on September 19, 2024 9:00am
Hearing on motions in limine (the Court will notify the parties in advance as to which motions will be argued)	September 12, 2024 10:30am
Deposition Designations (due for exchange between parties)	Parties to propose deadline
Objections to Deposition Designations and Counter Designations (due for exchange between parties)	Parties to propose deadline

<u>Event</u>	<u>Amended Deadline/Deadline Range (where applicable)</u>
Deadline for Submitting Deposition Designations Matrices and Highlighted Transcripts to the Court (via e-mail)	September 16, 2024
Parties to File Jointly Proposed Jury Instructions and Verdict Form	September 16, 2024
Parties to Submit Joint Final Pretrial Order (use Utilities function in CM/ECF and e-mail)	September 16, 2024
Parties to Submit Jointly Proposed Voir Dire Questions and Joint Statement of the Case (via e-mail)	September 20, 2024

<u>Event</u>	<u>Amended Deadline/Deadline Range (where applicable)</u>
Status Conference Regarding Excusals Based on Jury Questionnaire Responses	TBD
Final Pretrial Conference and Hearing on proposed Jury Instructions and Verdict Form	September 23, 2024 10:30am cont'd if needed on September 24, 2024 10:30am
Deadline for Court to Inform Jury Dept of Excusals Based on Questionnaires (Court Staff Only)	October 2, 2024
Hearing Regarding Misc. Pretrial Matters (if needed)	October 7, 2024
First Day of Trial/Voire Dire	October 8, 2024

Dated August 19, 2024

Respectfully submitted,

/s/ Corey M. Stern  
Corey M. Stern  
Melanie Daly  
LEVY KONIGSBERG, LLP  
605 3rd Ave., 33<sup>rd</sup> Floor  
New York, NY 10158  
(212) 605-6200  
cstern@levylaw.com  
mdaly@levylaw.com

/s/ Patrick J. Lanciotti  
Patrick J. Lanciotti  
NAPOLI SHKOLNIK PLLC  
360 Lexington Avenue, 11th Floor  
New York, NY, 10017  
(212) 397-1000  
planciotti@napolilaw.com

***ATTORNEYS FOR BELLWETHER III PLAINTIFFS***

/s/ James M. Campbell  
James M. Campbell  
Alaina N. Devine  
CAMPBELL CONROY & O'NEIL, P.C.  
20 City Square, Suite 300  
Boston, MA 02129  
(617) 241-3000  
jmccapbell@campbell-trial-lawyers.com  
adevine@campbell-trial-lawyers.com

/s/ Michael A. Olsen  
Michael A. Olsen  
MAYER BROWN LLP  
71 S. Wacker Drive  
Chicago, IL 60606  
(312)-782-0600  
molsen@mayerbrown.com

***ATTORNEYS FOR VEOLIA WATER NORTH AMERICA OPERATING  
SERVICES, LLC, VEOLIA NORTH AMERICA, LLC, AND VEOLIA NORTH  
AMERICA, INC.***

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon counsel of record and any unrepresented parties via the Court's ECF System to their respective email or first-class U.S. mail addresses disclosed on the Notice of Electronic Filing on August 19, 2024.

/s/ James C. Campbell  
James C. Campbell